

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANK SACO,)
Plaintiff.)
)
)
)
v.) CIVIL ACTION NO.
) 03-12551-MBB
)
TUG TUCANA CORPORATION,)
Defendant.)

AFFIDAVIT OF FRANK SACO

I, Frank Saco, on oath depose and say as follows:

1. My name is Frank Saco, and I am the plaintiff in the above-captioned action. I make this Affidavit in support of my claim for Maintenance and Cure. The facts set forth in this Affidavit are derived from my personal knowledge.
2. On April 13, 2003 I was serving as a member of the crew of the TUG TUCANA.
3. While the TUG TUCANA was in navigable waters and while I was in the exercise of due care and in the performance of my duties I was caused to trip and fall causing a Lis Franc fracture of my right foot.
4. As a result of the accident, I have had five surgeries including insertion and removal of plates and screws.
5. As a result of the accident, I have been unable to return to any form of gainful employment, have been unable to afford proper medical treatment, and have suffered both physically and financially.
6. I live in an apartment for which I pay a monthly rental payment of \$962.00.
7. I spend approximately \$100.00 per week on groceries (food and necessities).
8. I spend approximately \$5.00 per day on utilities (electric, oil and water).
9. While I was attending physical therapy and medical appointments, I was spending approximately \$25.00 dollars per week on gas and insurance for my vehicle.

10. During my period of convalescence I used the services of a Home Health Aide. The bills incurred as a result of this aide are \$3930.00.
11. True copies of canceled checks and bills are attached as Exhibit B and C.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 9th DAY OF AUGUST 2006.

/s/Frank Saco
Frank Saco